

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:  
Cyrilla Landscaping & Supply Co. Inc.,  
Debtor(s)

Eric E. Bononi, Trustee,  
Movant

v.  
Cyrilla Landscaping & Supply Co. Inc.,  
Respondent(s)

Bankruptcy No. 17-23819-GLT

Chapter 7

**APPLICATION TO EMPLOY ATTORNEY FOR TRUSTEE**

AND NOW, comes Eric E. Bononi, Trustee in the above captioned Chapter 7 proceeding, and respectfully represents as follows and declares under penalty of perjury:

1. The above-captioned case was commenced by the filing of a voluntary petition for relief under Chapter 11 of the Bankruptcy Code on September 22, 2017. The case converted to Chapter 7 of the Bankruptcy Code on August 26, 2019

2. The Applicant is the duly qualified and acting Trustee in this case.

3. To perform his duties as Trustee, your applicant requires the services of attorneys for the following purposes:

a. To advise and consult with applicant concerning questions arising in the conduct of the administration of the estate and concerning the applicant's rights and remedies with regard to the estate's assets and the claims of secured, preferred, and unsecured creditors and other parties in interest;

b. To appear for, prosecute, defend and represent applicant's interest in suits arising in or related to this case;

c. To investigate and prosecute preference and other actions arising under the Trustee's avoiding powers;

d. To assist in the preparation of such pleadings, motions, notices and orders as are required for the orderly administration of this estate; and to consult with and advise applicant in connection with the operation of or the termination of the operation of the business of the debtor.

4. For the foregoing and all other necessary and proper purposes, Trustee desires to serve as his own attorney together with the law firm of Bononi & Company, P.C.

5. Because Eric E. Bononi, Esquire and the law firm of Bononi & Company, P.C. practice regularly in matters of this character and because of their experience in this field, Trustee believes that they are well qualified to serve as the attorneys for the Trustee in this case.

6. Based upon the Verified Statement of Proposed Attorney attached hereto, applicant believes that said law firm and its members and associates, do not hold or represent any interest adverse to that of your applicant or the debtor estate and that said law firm is a disinterested person within the meaning of 11 U.S.C. § 101.

7. The Trustee believes that it is in the best interest of the estate and its economical administration that he be authorized to appoint the law offices of Bononi & Company, P.C. at a rate of \$275 per hour, subject to periodic increases, to serve as attorney for the Trustee. It is contemplated that said attorneys will seek compensation based upon normal and usual hourly billing rates. It is further contemplated that said attorneys will seek interim compensation during the case as permitted by 11 U.S.C. § 331.

8. The court has power to authorize employment of Eric E. Bononi, Esquire and the law firm of Bononi & Company, P.C., pursuant to 11 U.S.C. § 327(a) which states in part:

“[T]he trustee, with the court’s approval, may employ one or more...attorneys...or other professional persons, that do not hold or represent an interest adverse to the estate, and that are disinterested persons, to represent or assist the trustee in carrying out the trustee’s duties under this title.”

WHEREFORE, Trustee prays that he be authorized to employ Eric E. Bononi, Esquire and the law firm of Bononi & Company, P.C. as his attorneys to render services in the areas described above with compensation to be paid as an administrative expense in such amounts as this court may hereinafter determine and allow upon application or applications to be filed by said attorney.

DATE: August 27, 2019

Prepared by:  
Eric E. Bononi, Esq.

Respectfully submitted,

/s/ Eric E. Bononi  
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